

REMARKS

Claims 1, 3-6 and 8-11 are all the claims pending in the application. Claims 2, 7, and 12-13 are canceled without prejudice or disclaimer. Claims 1, 3-6 and 8-11 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,601,167 (hereinafter, "Gibson").

Applicant submits the following in traversal.

Rejection of claims 1, 3-6 and 8-11 under §102(e) over Gibson

Applicant respectfully submits that claim 1 is patentable because Gibson fails to disclose or suggest each and every element of claim 1. Claim 1 recites an apparatus wherein:

the cache module comprises:

a cache controller that if the read operation is required by the main control unit, accesses the serial flash, reads a page to which the designated memory address belongs, and transmits data in the read page corresponding to the designated memory address to the main control unit;

a tag-storing unit on which storage information on the read page is written in response to an operation control of the cache controller; and

a data-storing unit on which the read page is written.

In the Office Action, the Examiner cites column 3, line 52 to column 4, line 34 as allegedly disclosing the above features of claim 1. Applicant respectfully disagrees.

Initially, in the Office Action, it is asserted that the XIP memory, shown as RAM 16 or processor 14 in Gibson, corresponds to the claimed cache module by citing column 5, lines 14-19. Then, it is alleged that the sequential access memory 32 corresponds to the claimed serial flash controller. Subsequently, the Examiner cites the section of Gibson describing the operation

of the sequential access memory 32 and the boot loader 34 as purportedly disclosing the cache controller.

In other words, the rejection is based on an impermissible double counting of the sequential access memory 32 as allegedly corresponding to both the cache controller and the serial flash controller. Further, the inconsistent characterization of two different components of Gibson as corresponding to the claimed cache controller further shows that Gibson fails to disclose or suggest claim 1.

For at least the above reasons, claim 1 is patentable.

For reasons similar to those submitted for claim 1, claims 6 and 8 are patentable.

Claims 3-5, which depend from claim 1, and claims 9-11, which depend from claim 8, are patentable for at least the reasons submitted for their respective base claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. §1.111  
U.S. APPLN. NO.: 10/694,832

ATTY DOCKET NO.: Q76050

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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